

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (CCC)
Consolidated with
CIVIL NO. 97-2437 (CCC)

**MOTION REQUESTING LEAVE TO REPLY TO
PLAINTIFFS' COMBINED RESPONSE TO DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT**

TO THE HONORABLE COURT:

NOW COMES co-defendant **Crowley Towing and Transportation Co.** (hereinafter "Crowley"), through the undersigned attorneys, and very respectfully states and prays as follows:

1. On January 29, 1999 Crowley filed a Motion for Summary Judgment, requesting that Plaintiffs' claims against it be dismissed insofar as under the uncontested facts involved, no real genuine controversy of material facts exists to be tried; and under the law, Crowley is entitled to judgment in its favor.

2. On August 24, 2004, Crowley received copy of the Plaintiffs' Combined Response to Defendants' Motions for Summary Judgment filed by Plaintiffs on that same date.

3. Crowley wishes to clarify Plaintiffs' unsupported and out of context factual allegations and legal arguments discussed in their Response.

4. Pursuant to Local Rule 7(c), Crowley hereby requests leave from this Court and an extension of time, until and including September 21, 2004, to file a Reply to Plaintiffs' Combined

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Response to Defendants' Motions for Summary Judgment. Leave is warranted, as there are certain allegations made by the Plaintiffs in their Motion that require clarification and correction.

WHEREFORE, the Defendant respectfully requests from this Honorable Court that it be granted leave to file a Reply to Plaintiffs' Combined Response to Defendants' Motions for Summary Judgment and an extension of time in which to file said Reply, up to and including September 21, 2004.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of September, 2004.

I CERTIFY: That on this same date a true and exact copy of the foregoing document has been sent to **J. H. Zidell**, Esq., City National Bank Building, 300 71st St., Suite 605, Miami Beach, FL 33141; **Ana Rosa Biascoechea**, Esq., P.O. 195332, San Juan, P.R. 00919-5332; **Ellen Silver**, Esq. Seafarers International Union, 5201 Auth Way, Camp Springs, MD 20746; and **Luis A. Suárez**, Esq., Calle Felipe Goyco 503, San Juan, PR 00915.

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